

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

FILED

JUL 12 2019

David J. Bradley, Clerk of Court

United States of America

v.

Manuel E. Candia-Reuter

Case No.

H19-1266M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/17/2019 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

18 U.S.C. § 2252A (a)(2)(B)

## Offense Description

Any person who knowingly distributes any material that contains child pornography that has been mailed, or using any mean or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

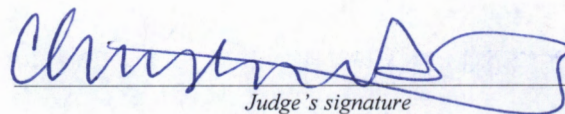
Ryan J. Shultz, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 12, 2019



Judge's signature

City and state:

Houston, Texas

United States Magistrate Judge Christina A. Bryan

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN THE MATTER OF:**  
Manuel E. Candia-Reuter

§  
§

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Ryan J. Shultz, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since September 2008. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest and performing other duties imposed by law. During my assignment with the FBI I have participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children. I have investigated many cases involving child pornography and the sexual exploitation of children. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers were used as the means for receiving, transmitting and storing child pornography as defined in Title 18, United States Code, Section 2256.
2. This affidavit is submitted for the limited purpose of establishing probable cause in support of the attached Complaint and therefore contains only a summary of the relevant facts. I have not included each and every fact known by me concerning the individuals and events described herein. The information contained in this affidavit is based on my firsthand knowledge as well as information obtained through witness interviews conducted by me or other Law Enforcement Officers or Special Agents of the FBI and a review of various records.
3. Sharing digital files through social media accounts is an increasingly common method of receipt and distribution with respect to the trafficking of child pornography material.

Such applications often allow users to connect in an online environment and communicate via text or through the use of posted images and/or videos. Users are typically required to register for an online account with a unique username and password and can choose to portray themselves as who they are in the real world or as an alternate, and often an anonymous, persona.

4. Launched in 2003 and acquired by Microsoft in 2011, Skype is a telecommunications application that specializes in providing video chat and voice communications between various electronic media devices to include computers, tablets, cell phones, video gaming consoles, etc. via the Internet. Skype allows for video conferencing for up to 25 users with additional slots made available for premium members. In addition, Skype also provides instant messaging services that allows users to transmit text, digital video and images as well as audio.
5. The Skype application is typically downloaded for free via the Internet. Once downloaded and installed to an electronic device capable of supporting the application, a prospective user is required to register an account with Skype which includes the creation of a unique username and password combination which is then entered and searchable within the Skype directory. Skype is not designed to be an anonymous communication network.
6. On or about March 18, 2019, the National Center for Missing and Exploited Children (NCMEC) received several complaints via their CyberTipLine from Skype. CyberTip Reports #47678037, #47678219, #47678459, and #47684088 were submitted to the NCMEC CyberTipLine by Skype as a result of approximately 4 files depicting suspected child pornography being posted from a Skype account created by a user identified by the Skype Screen/User name "alancheve".
7. Your Affiant has reviewed general information regarding Skype and has learned that Skype is a multimedia telecommunications service that allows users to upload and share digital files through a Web browser on their computer or any internet capable device. Digital files can be kept private or can be shared with contacts of the users choosing.

8. Skype confirmed that each of the 4 files referenced in the CyberTip Reports listed in paragraph 6 were viewed by Skype, prior to submission to NCMEC, in accordance with their standard course of operating procedures. Furthermore, Skype revealed that user “alancheve” uploaded, or distributed, the referenced files of suspected child pornography while utilizing the Skype platform.
9. In CyberTip Report #47678037, Skype advised that 1 file of suspected child pornography had been posted from a Skype account utilizing Skype Screen/User name “alancheve”. The image of suspected child pornography was posted on March 17, 2019, at 06:32:19 UTC from IP address 73.32.219.19.
10. Skype reported similar incidents in CyberTip Reports #47678219, #47678459, and #47684088 in which Skype user “alancheve” posted images of suspected child pornography via IP address 73.32.219.19 on March 17, 2019, at 07:03:53 UTC, at 07:30:00 UTC, and at 07:42:03 UTC respectively.
11. Your Affiant received the aforementioned NCMEC CyberTips and has reviewed all 4 files that were uploaded to the Skype account associated with Skype Screen/User name “alancheve”. Your Affiant determined that each respective file depicts child pornography as defined by Title 18, United States Code, Section 2256. Below is a description of three of the files that meet the federal definition of child pornography which were uploaded by the Skype user associated with Skype Screen/User name “alancheve”:

**a) Filename:** 4c1830e8-ce1c-497e-ad25-84e47b0e93a9.jpg

**Description:** This is a still image file that depicts a nude minor male, estimated to be less than 12 years of age, seated on a couch with his erect penis observed as a focal point of the image. In the background of the image, a minor female, also estimated to be less than 12 years of age, is observed to be topless and staring at the minor male’s penis.

**b) Filename:** 26974b1a-63c3-477e-bed1-2c92a184edd2.jpg

**Description:** This is a still image file that depicts a nude minor female, estimated to be less than 15 years of age, straddling and holding the breasts of a nude adult female. This image was uploaded to the Skype account twice.

**c) Filename:** 79f4af0f-488c-4ddf-93f8-ab95f4ec6a7b.jpg

**Description:** This is a still image file that depicts three nude minor females, all estimated to be less than 14 years of age, with their genitals exposed to the camera. One of the minor females is observed to be facing away from the camera while bent over and on her knees with her legs spread, thereby exposing her genitals and anus to the camera. The other two minor females are facing the camera and each has a hand on a butt cheek of the minor female facing away from the camera.

12. On or about May 25, 2019, an administrative subpoena was served to Comcast in pursuit of subscriber information pertaining to IP address 73.32.219.19 as assigned on March 17, 2019, at 06:32:19 UTC. On May 28, 2019, Comcast provided a response which identified the subscriber for the identified IP as Manuel Candia with a service address on Tucker House Lane in Katy, Texas.
13. On June 24, 2019, a law enforcement database search for the aforementioned address in Katy, Texas revealed one known occupant of the residence as Manuel Candia, also known as Manuel Ernesto Candia-Reuter. Furthermore, a search for this address within the Texas Sex Offender Registry revealed one record indicating that Manuel Candia is registered as a sex offender at the identified address. A review of the registry revealed that Manuel Candia was convicted in violation of the Texas Penal Code 43.26(a), Possession of Child Pornography. Manuel Candia received an 8-year deferred sentence.
14. On July 12, 2019, FBI Houston executed a federal search warrant at Manuel Candia's residence in Katy, Texas. Manuel Candia was encountered at the time of the search warrant execution, and after being advised of his *Miranda Rights*, chose to make a statement in the presence of your Affiant and FBI Special Agent Robert Guerra.
15. Candia stated to agents that he was responsible for creating and utilizing the "alancheve" Skype account for the purposes of obtaining and sharing child pornography material, which he conducted from a personal desktop computer at his residence.
16. At your Affiant's request, Candia agreed to review a contact sheet containing the images of child pornography described above in paragraph 11. Upon review of the contact sheet,

Candia acknowledged that he recognized each of the images as child pornography he had viewed and uploaded through the “alancheve” Skype account. He further admitted that he had sent those images to an unknown female through Skype.

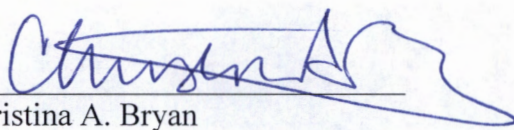
17. Candia most commonly received images of child pornography through the use of Skype or through the use of a similar video messaging service called Omegle. Though he viewed child pornography from both his personal desktop computer and his personal iPhone cellular telephone, Candia advised that he did not believe agents would find any child pornography stored on his devices.
18. Candia explained that as a registered sex offender he regularly attends weekly sex offender counseling sessions, which is something he had found helpful since his 2013 conviction. Nonetheless, Candia stated that in early 2019 he relapsed and began searching for and viewing child pornography again. Though he knew it to be illegal, Candia described child pornography as an addiction that he was struggling with once again.
19. Candia described his normal procedure with respect to obtaining and viewing child pornography as obtaining the material through either Skype or Omegle. However, once his urge to view the material had been satisfied, Candia explained that he would panic and shortly thereafter delete the content from whichever device he was using at the time. Candia stated that he would then be okay for approximately 2 weeks before the cycle would repeat itself.

**CONCLUSION**

20. Based on all information set forth above, your Affiant believes there is probable cause to believe that on or about March 17, 2019, Manuel E. Candia-Reuter, was in violation of Title 18 U.S.C. § 2252A (a)(2)(B) the distribution of child pornography.

  
Ryan J. Shultz, FBI Special Agent

Subscribed and sworn before me this 12<sup>th</sup> day of July 2019, and I find probable cause.

  
Christina A. Bryan  
United States Magistrate Judge